

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

SQUARE D COMPANY and SCHNEIDER	)	
ELECTRIC, S.A.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	CASE NO.: 07 C 6294
	)	
ELECTRONIC SOLUTIONS, INC., and	)	Judge James B. Moran
WILLIAM AMBROS,	)	
	)	
Defendants.	)	

**PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

Plaintiffs Square D Company ("Square D") and Schneider Electric, S.A. ("Schneider") (collectively "Plaintiffs") move pursuant to Federal Rule of Civil Procedure 65 and 15 U.S.C. § 1116(a) for a preliminary injunction against Electronic Solutions, Inc. and William Ambros (collectively, "Defendants") (1) enjoining each Defendant from directly or indirectly selling, transferring, destroying or otherwise disposing of electrical contactors, switches, circuit breakers or other electrical components in their possession that bear Plaintiffs' trademarks, including all Telemecanique models, until such time as (a) Defendants have produced a complete inventory listing all electrical components in their possession, custody or control bearing Plaintiffs' trademarks and (b) Plaintiffs have inspected at one location for each of the Defendants, the Defendant's complete inventory of electrical components bearing Plaintiffs' trademarks for the presence of counterfeit products; and (2) enjoining each Defendant from directly or indirectly selling, transferring, destroying or otherwise disposing of electrical components in their possession, custody or control bearing Plaintiffs' trademarks which Plaintiffs have inspected and determined to be counterfeit; and (3) (a) ordering Defendants to relinquish immediately to Plaintiffs any documents, computers, and electronic files that may contain information relating to

the Defendants' purchase or sale of electrical components that bear Plaintiffs' trademarks, or alternatively, (b) enjoining each Defendant from directly or indirectly destroying, altering, or otherwise disposing of any document reflecting Defendants' purchase or sale of electrical components bearing Plaintiffs' trademarks from 2004 to the present time, and ordering that each Defendant subject its computer(s) containing potentially relevant documentation to a forensic inspection and examination by Plaintiffs. In support of its motion, Plaintiffs submit their Memorandum of Law In Support of Motion for Preliminary Injunction.

Dated: January 22, 2008

Respectfully submitted,

**/s/ Christopher T. Sheean**

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